

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as	:	
Administrators of the Estate of LOUIS	:	
JUNG, JR,	:	No. 2:24-cv-05618-TJS
:		
Plaintiff,	:	
:		
v.	:	<b>JURY TRIAL DEMANDED</b>
:		
CITY OF PHILADELPHIA; YesCare Corp.;	:	
BLANCHE CARNEY, Former	:	
Commissioner of Philadelphia Dept. of	:	
Prisons; LALITHA TRIVIKRAM;	:	
MAUREEN GAY; MARIESHA APOLLON,	:	
BLAIR CABELLOS, GENA FRAISER,	:	
WANDA BLOODSAW	:	
:		
Defendants.		

**CERTIFICATE OF MERIT**

I, Nia Holston, Esquire, certify that:

An appropriate licensed physician and expert in diabetes care, Louis Phillipson, M.D., Ph.D, has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by defendant Mariesha Apollon in the above-captioned action in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

Respectfully submitted,

/s/ Nia O. Holston  
Nia Holston  
PA I.D. No. 327384  
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BLAIR CABELLOS, GENA FRAISER,	:	
WANDA BLOODSAW	:	
:		
Defendants.		

**CERTIFICATE OF SERVICE**

I, Nia O. Holston, hereby certify that I caused a true and correct copy of the foregoing Certificate of Merit to be electronically filed on this 8<sup>th</sup> day of May, 2025, and thereby served on all parties listed in the Court's ECF filing system.

Nia O. Holston

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